

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

REGINA WILLIAMS, Individually)	
and as Personal Representative of)	
the Estate of George Rouse, Deceased,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CIV-2013-759-M
)	
BOARD OF COUNTY)	
COMMISSIONERS OF GRADY)	
COUNTY, <i>ET AL.</i> ,)	
)	
Defendants.)	

PLAINTIFF'S FINAL WITNESS & EXHIBIT LIST

Plaintiff hereby submits the following as their Final Witness and Exhibit List in compliance with the Court's Order Amending the Scheduling Order [Doc. 88] filed herein on January 18, 2018 and hereby states as follows:

No.	Name	Subjects of Information
1	Regina Williams c/o ALLEN & GARRETT, ATTORNEYS 427 S. Boston Avenue, Suite 320 Tulsa, Oklahoma 74103 Telephone: (918) 895-7216	May testify to any facts and circumstances relevant to the allegations contained in the Complaint.
2	Defendant Art Kell c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint and Policies and Procedures.
3	Undersherriff Angela Sharrapa c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Training.
4	Ricky Rushing c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor	May testify to any facts and circumstances relevant to the allegations contained in the Complaint.

	Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	
5	Jim Gerlach c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
6	Guy Higgins c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
7	Shane Wyatt c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
8	Kody Krawtzwow c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
9	Darren Perske c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
10	Anita Nelson c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
11	Corwyn King c/o Stephen L. Geries 428 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Telephone: (405) 524-2070	May testify to any facts and circumstances relevant to the allegations contained in the Complaint, Policies and Procedures, and Operations of Jail.
12	Francia Thompson c/o Oklahoma Attorney General's Office Litigation Section 313 NE 21 st Street Oklahoma City, OK 73105 Telephone: (405)_521-3921	May testify to any facts and circumstances relevant to the allegations contained in the Complaint.
13	Marvin Akers	

	c/o Oklahoma Attorney General's Office Litigation Section 313 NE 21 st Street Oklahoma City, OK 73105 Telephone: (405)_521-3921	
14	Ryan Lake To Be Supplemented	May testify to any facts and circumstances relevant to the allegations contained in the Complaint.
15	Any necessary custodian of records	
16	Any and all witnesses necessary for rebuttal or impeachment purposes	
17	Any and all witnesses endorsed by Plaintiff and not objected to by Defendants	
18	Any and all witnesses identified through ongoing discovery not objected to by Defendants	

FINAL EXHIBIT LIST

NO.	DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS
1	Funeral and Burial Expenses
2	Death Certificate of George Rouse
3	Medical Examiner's Report of George Rouse
4	OSBI Investigative Report
5	Grady County Law Enforcement Booking Documents
6	Grady County Sheriff's Department Incident Reports
7	Documents provided to all Defendants and their employees prior to Plaintiff's arrest and booking
8	Documents provided to all Defendants and their employees at Plaintiff's booking and during arrest
9	All training materials used by Defendants and their employees at the time of the incident
10	All policies and procedures concerning booking, arresting, and processing of suspects, inmates.
11	All policies and procedures concerning suicidal suspects either under arrest or custody
12	Videos of Incident(s)
13	Anatomical drawings, figures, or models
14	Demonstrative Exhibits
15	Enlargement of Exhibits
16	Records requested but not yet produced
17	Exhibit which may become known during future discovery
18	All documents listed by Defendants, not otherwise objected to by Plaintiff
19	Any documents produced by Defendant not objected to by Plaintiff
20	Any exhibit needed for rebuttal or impeachment

/s/ D. Mitchell Garrett, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March 2018, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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County Industrial Authority and Art Kell*

/s/ D. Mitchell Garrett, Jr.
D. Mitchell Garrett, Jr.